

## DEPARTMENT OF CONSERVATION

## DIVISION OF OIL AND GAS

301 WEST CHURCH STREET, P. O. BOX 227  
SANTA MARIA, CALIFORNIA 93456  
(805) 925-2686



September 10, 1985

Kati Neidig  
EPA (W-6-2)  
215 Fremont Street  
San Francisco, CA 94105

Dear Ms. Neidig:

Attached herewith is a copy of the public notice for the proposal to grant an aquifer exemption for the "D" sand at McCool Ranch oil field.

As of this date, no comments have been received regarding the proposal.

Please inform this office of EPA's decision on this aquifer exemption request.

Very truly yours,

  
K. P. Henderson  
Deputy Supervisor

KPH:df  
Attachment

cc: Bob Reid

ATTACHMENT B

## PROOF OF PUBLICATION

DIVISION OF OIL AND GAS  
RECEIVED

AUG 12 1985

Santa Maria California

STATE OF CALIFORNIA  
County of San Luis Obispo

ss.

Ben Reddick

....., of said county, being first duly sworn, deposes and says: That I am the publisher of The Daily Press, a newspaper printed and published daily, Saturdays and Sundays excepted, at Paso Robles, in the County of San Luis Obispo, State of California; that the notice, of which a true copy is hereto attached, was published in the above-named newspaper on the following dates, to wit:  
Aug 5 6 & 7th

### PUBLIC NOTICE

#### PUBLIC NOTICE

In accordance with the criteria of 40 CFR 146.4 of the Federal EPA Underground Injection Control (UIC) program, the State Division of Oil and Gas hereby invites comments on the proposal to grant an "aquifer" exemption for the "D" sand within the areas known as McCool Ranch oil field located in Sec. 14, 15, 22, & 23, T.22S, R.10E, M.D.B&M, Monterey County. Oilfield waste waters of 7020 ± ppm T.D.S. are proposed to be injected into the "D" sand at a depth below 1625' to 1890'. The T.D.S. content of the formation waters within the "D" sand is 7520 ± ppm T.D.S. Additional information may be obtained by contacting Al Koller, Division of Oil and Gas, 301 West Church Street, Santa Maria, CA 93454, (805) 925-2886.

Comments on this proposal should be submitted to the above office no later than 15 calendar days from the date of publication of this notice.

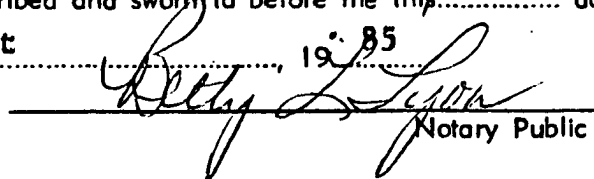
K. P. Henderson  
Deputy Supervisor

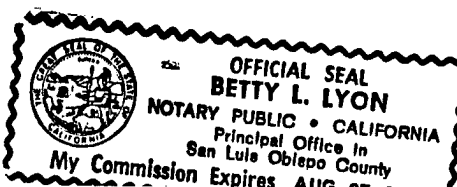
Pub. Mon. Aug. 5, Tues.  
Aug. 6, Wed. Aug. 7.  
THE DAILY PRESS  
Legal No. 10543

that said newspaper was duly and regularly ascertained and established a newspaper of general circulation by decree entered in the Superior Court of San Luis Obispo County, State of California, on June 30, 1952, under the provisions of Chapter 1, Division 7, Title 1 of the Government Code of the State of California. Court decree No. 19176

  
Signature

Subscribed and sworn to before me this 7th day  
of August, 1985

  
Notary Public



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. M.G. Mefferd  
State Oil and Gas Supervisor  
Division of Oil and Gas  
1416 Ninth Street, Room 1310  
Sacramento, CA 95814

Dear Mr. Mefferd:

EPA hereby approves the aquifer exemption request made by the California Division of Oil and Gas for the McCool Ranch field. Specifically, the "D" sands underlying Sections 14, 15, 22, and 23 of Township 22S and Range 10E is exempted to allow injection of Class II fluids. Documentation supporting this decision is enclosed.

This aquifer exemption request meets the criteria for a "non-substantial" program revision. The approval is issued in accordance with EPA "Guidance for Review and Approval of State UIC Programs and Revisions to Approved State Programs". The exemption is approved in compliance with 40 Code of Federal Regulations (CFR) Part 146.4 (a) and (c).

Sincerely,  
Original Signed by:  
*S. Pandiech*

Frank M. Covington, Director  
Water Management Division

Enclosures

Neidig: Sharon  
Proj. #012F/Neidig  
Final 12/4/85

CONCURRENCES							
SYMBOL	W-6-2						
SURNAME	Neidig						
DATE	12/4/85						

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

0 5 DEC 1985

Approval of an Aquifer Exemption to Allow Injection of Class II Fluids

Original Signed by:  
Steve Pardueck, Chief  
Water Supply Branch

Frank M. Covington, Director  
Water Management Division

The California Division of Oil and Gas (CDOG) has submitted a request for an aquifer exemption. Other aquifer exemptions were approved by EPA in delegating the UIC program to CDOG. This is the first request to be processed since CDOG's program was approved and is a non-substantial program revision to CDOG's UIC program. The Office of Drinking Water issued Guidance #34 which outlines the procedures and requirements for processing such requests. The attached analysis and recommendation were developed in accordance with Guidance #34.

The authority for approval of non-substantial revisions was delegated to the Regional Administrator and further delegated to the Division Director by Regional Order R 1250.20. According to Guidance #34, after the program revision is approved, the Region will forward a copy of the approval letter and the approved revision to the State Program Division in Headquarters.

An analysis of the requested exemption and an approval letter is attached. These documents serve as a record of decision to substantiate the exemption.

Attachments

Neidig:Sharon  
Proj. #012F/Neidig Disk  
Final 12/4/85

				CONCURRENCES			
SYMBOL	W-6-2	W-6-2					
SURNAME	Neidig	Neidig					
DATE	12/4/85	12/5/85	12/5/85				

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

ANALYSIS OF REQUEST  
FOR AQUIFER EXEMPTION  
FOR CLASS II FLUIDS

Summary of Significant Information. The request is to exempt four sections of the "D" sands in the McCool Ranch field (Monterey County). The "D" sands is a formation that has already been exempted by EPA in the field adjacent to McCool Ranch.

The aquifer does not currently serve as a source of drinking water and is not reasonably expected to do so in the future.

The total dissolved solids (TDS) concentration of the formation fluids is 7520 ppm and that of the fluid to be injected is approximately 7020 ppm.

The aquifer was used for injection of Class II fluids prior to EPA delegating primacy to CDOG for the UIC program under the Safe Drinking Water Act.

Evaluation Criteria. This aquifer exemption request was evaluated in accordance with 40 CFR 146.4 (a) and (c) which requires that the aquifer does not currently serve as a source of drinking water; that the TDS content of the ground water is more than 3,000 ppm and less than 10,000 ppm and that it is not reasonably expected to supply a public water system.

Guidance #34 requires the following items to be addressed in the review: general information must be submitted to EPA to make the above determinations, information regarding the potential for public water supply use of the formation must be analyzed, and the public must be given an opportunity to comment and request a hearing.

CDOG submitted the general information as required. (See Attachment A).

In addition to the information submitted by CDOG, EPA further researched the potential for or any planned use of this formation as a future source of drinking water. EPA contacted the local water district, the Monterey County Health Department and the Monterey County Flood Control. The Flood Control group identified itself as the local water district and said that they had no objection to allowing injection of Class II fluids into that formation. The Department of Health expressed concern for the protection of the overlying aquifers from the wells that will be penetrating those formations; but they had no opposition to allowing injection of Class II fluids into the "D" sands formation.

The criteria for review of an aquifer exemption does not address concerns for overlying formations since the UIC construction and operational requirements for wells address the protection of those formations. EPA contacted CDOG about the County Health Department's concerns and CDOG has since presented its requirements for well operation and construction to the Health Department.

An additional consideration in determining whether the formation could reasonably be expected to supply a water system is that, prior to delegation of primacy to CDOG, this aquifer was used for disposal of oil field brine. Therefore, the natural TDS concentration, the constituents introduced by earlier injection, and the availability of other drinking water sources in the area show that this would not reasonably be expected to supply drinking water.

Finally, Guidance #34 allows the State to issue a public notice for an aquifer exemption in conjunction with its permitting process. CDOG issued a public notice in compliance with its procedures for issuing notice of a permitting action (See Attachment B). No comments were received.

Recommendation. This request meets the criteria for exemption under 40 CFR Part 146.4 (a) and (c). Further, the formation is already exempted in an adjacent field and this portion of the formation has been used in the past for disposal of Class II fluids. Finally, after request for comment and contacting local water agencies, no comments opposing the exemption of the aquifer were received.

It is recommended that EPA exempt the "D" sands underlying Sections 14, 15, 22, and 23 of Township 22S, Range 10E to allow injection of Class II fluids as defined in 40 CFR 146.5.